

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**U.S. BANK NATIONAL ASSOCIATION AS
LEGAL TITLE TRUSTEE FOR TRUMAN
2016 SC6 TITLE TRUST,
PLAINTIFFS,
v.
ROBERT TED BROWN; MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, INC.; AND INTERNAL
REVENUE SERVICE,
DEFENDANTS.**

C.A. No. 21-CV-00198-JJM-PAS

**PLAINTIFF'S SUPPLEMENTAL
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

The Plaintiff, U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust, hereby files a Supplemental Corporate Disclosure Statement, pursuant to the amended Rule 7.1(a)(2) of the Federal Rules of Civil Procedure. For the purpose of diversity jurisdiction, as of the time of filing this complaint on May 4, 2021, the parties citizenship was, upon information and belief, as follows:

1. Truman 2016 SC6 Title Trust was a New York Common Law Trust, pursuant to a Second Amended and Restated Trust Agreement (the “Trust Agreement”) dated as of February 26, 2021.
2. U.S. Bank National Association is appointed as Legal Title Trustee to the Trust Fund.
3. U.S. Bank National Association is an incorporated national banking association with a principal place of business located at 1133 Rankin Street, Suite 100, St. Paul, Minnesota 55116.
4. The Defendant, Robert Ted Brown, is an individual, who at the time of filing, had a last known residence of 199 Hudson Pond Road, West Greenwich, RI 02817.

5. The Defendant/Party-in-Interest, MERS, is a Delaware corporation with a principal place of business at 1818 Library Street, Suite 300, Reston, VA 20190.
6. The Defendant/Party-in-Interest, Internal Revenue Service (“IRS”), is a bureau of the United States Department of the Treasury located in Washington, District of Columbia.

Respectfully submitted,
PLAINTIFF,
By its attorneys,

/s/ Rowdy M. Cloud
Rowdy M. Cloud, Esq. # 9383
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Dated: April 30, 2024

CERTIFICATE OF SERVICE

I, Rowdy M. Cloud, hereby certify that, on this 30th day of April 2024, I caused a copy of the *Supplemental Rule 7.1 Corporate Disclosure Statement* to be filed and served via the ECF system on the parties registered to receive electronic service in this matter.

The document is available for viewing and/or downloading from the ECF system.

/s/ Rowdy M. Cloud
Rowdy M. Cloud, Esq. (#9383)